

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TENNESSEE
AT KNOXVILLE**

| | | |
|--|---|-------------------------------|
| ANN LEDFORD, individually and as next |) | |
| friend and mother of Johnathan Binkley, |) | |
| Deceased, |) | |
| Plaintiff, |) | |
| v. | : | 3:20-cv-00325-DCLC-HBG |
| |) | |
| KNOX COUNTY, TENNESSEE, <i>et al.</i> |) | JURY DEMANDED |
| |) | |
| Defendants. |) | |

**JOINT MOTION REGARDING THE PARTIES' REQUEST
FOR ALTERNATIVE DISPUTE RESOLUTION, A TEMPORARY STAY,
AND RELATED SCHEDULING AND DEADLINES**

The parties, through counsel, jointly move this Honorable Court for an Order granting the parties' request for alternative dispute resolution ("ADR"), for a temporary stay of these proceedings pending ADR; and for certain related adjustments regarding scheduling and deadlines. In support of this motion, the parties say as follows:

1. Subject to the Court's approval, the parties would like to pursue ADR and, more specifically and if acceptable with the Court, a judicial settlement conference with a judicial officer not assigned to this case. Because of the nature and complexity of the case, the parties believe that a judicial officer would be best suited to facilitate discussions in this matter regarding a potential resolution and to provide neutral, non-binding feedback, assuming a judicial officer is both available and willing to do so.

2. If acceptable to the Court and if a judicial settlement conference is arranged, the parties respectfully request that this case be temporarily stayed.

3. Further, to ensure that the case moves forward in a timely manner if the case is not resolved beforehand, the parties have agreed, subject to the Court's approval, that: (i) the parties

shall conduct their Rule 26(f) conference on April 7, 2021; (ii) Defendants' response to Plaintiff's Second Amended Complaint [Doc. 37] shall be filed by no later than April 21, 2021; and (iii) the depositions of the parties shall take place the weeks of May 10 and May 17, 2021.

WHEREFORE, the parties respectfully request that an order be entered: (a) allowing the parties to engage in alternative dispute resolution through a judicial settlement conference; (b) staying this case temporarily; and (c) providing that if this case is not resolved by agreement beforehand, that (i) the parties shall conduct their Rule 26(f) conference on April 7, 2021, (ii) the Defendants' response to Plaintiff's Second Amended Complaint [Doc. 37] shall be filed by April 21, 2021; and (iii) the depositions of the parties shall be conducted the weeks of May 10 and May 17, 2021.

Respectfully submitted this 18th day of January, 2021.

s/Wayne A. Ritchie II
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